### DOCKET FILE COPY ORIGINAL

# BEFORE THE FEDERAL COMMUNICATIONS COMMISSION WASHINGTON, D. C. 20554



In the Matter of Applications of	) WT DOCKET NO. 02-179
RESORT AVIATION SERVICES, INC.	
For Renewal of Aeronautical Advisory Station WYT9, Coeur d'Alene Airport, Hayden, Idaho	) CERTIFICATION ON ANSWERS ) TO INTERROGATORIES )
and	)
KQOTENAI COUNTY COEUR D'ALENE AIRPORT	) ) )
For a New Aeronautical Advisory Station at Coeur d'Alene Airport, Hayden, Idaho	) )

Scott W. Reed, attorney for Resort Aviation Services, Inc., certifies as follows:

Attached hereto are true and correct copies of the answers of Kootenai County to interrogatories Nos. 16 and 37 as delivered to me.

Dated this 20th day of December, 2002.

Scott W. Reed Attorney for Resort Aviation

Services, Inc.

P. **O. Box** A

Coeur d'Alene, Idaho 83816

(208) **664-2161** 

Fax: (208) 765-5117

No. of Copies rec'd\_0+6
List ABCDE

**CERTIFICATION C** 

1

I hereby certify that a true and exact copy of the foregoing was sent by Federal Express on December 20, 2002 to:

ADMINISTRATIVE LAW JUDGE ARTHUR I. STEINBERG FEDERAL COMMUNICATIONS COMMISSION 445 12TH STREET, S.W., ROOM 1-C861 WASHINGTON, D.C. 20054 FAX (202) 418-0195

DANA LEAVITT ATTORNEY AT LAW INVESTIGATIONS AND HEARINGS DIVISION FEDERAL COMMUNICATIONS COMMISSION 445 12TH STREET S. W. - ROOM 3-B443 WASHINGTON, D. C. 20554 FAX (202) 418-2644

and by regular mail, postage prepaid to:

JOHN CAFFERTY, ESQ.
KOOTENAI COUNTY DEPT, OF
LEGAL SERVICES

P. O. BOX 9000 (COEUR D'ALENE, IDAHO 83816-9000

Kootenai County Department of Legal Services John A. Cafferty, Legal Counsel, ISB # **5607** Post Office **Box** 9000

Coeur d'Alene, ID 83816-9000

Phone: **208-446-1620** Fax: 208-446-1621

Attorney for Kootenai County Coeur d'Alene Airport

## ORIGINAL

Before the FEDERAL COMMUNICATIONS COMMISSION Washington, D.C. **20554** 

In the Matter of Applications of	WT DOCKET NO. 02-179
RESORT AVIATION SERVICES, INC.	KOOTENAI COUNTY'S RESPONSESTO INTERROGATORIESAND REQUESTS FOR PRODUCTION OF RESORT AVIATION SERVICES, INC. TO KOOTENAI COUNTY, COEUR D'ALENE AIRPORT
For Renewal of Aeronautical Advisory Station WYT9, Coeur d'Alene Airport, Hayden, Idaho	<b>,</b> ) }
and	) \
KOOTENAI COUNTY COEUR D'ALENE AIRPORT,	) ) )
For a New Aeronautical Advisory Station at Coeur d'Alene Airport, Hayden, Idaho	) ) )

COMES NOW, Greg Delavan, Airport Manager of the Coeur d'Alene Airport, by and through his attorney John A. Cafferty of Kootenai County Legal Services, and hereby

#### **INTERROGATORY NO. 16:**

- (a) Please identify all persons in the employ of Kootenai County located at the Coeur d'Alene Airport who are qualified Unicom operators as of this date.
  - (b) As to each such person, please provide the following information:
  - (i) Training given to each identifying the trainer or instructor.
  - (ii) Date of training beginning and ending,
  - iii) Certification or other indicia indicating completion of training.
  - (iv) Length of time in operating Unicorn.

### ANSWER TO INTERROGATORY NO. 16:

(a) At this time, there are no persons in the employ of Kootenai County who are qualified Unicorn operators; however, this issue is presently pending before **the** FCC.

INTERROGATORY NO. 37: Please state in detail all of the facts, opinions and reasons why you are opposed to having the Unicorn license of Resort Aviation Services, Inc. renewed.

ANSWER TO INTERROGATORY NO. 37: Objection, this interrogatory seeks privileged information, to wit, the opinions and trial strategies of counsel, which are not admissible and are not likely to lead to the discovery of admissible evidence. Without waiving said objection, Kootenai County is hot opposed to Resort Aviation Services, Inc. operating a Unicorn license. It is the opinion of Kootenai County that if only one Unicorn license is to be allowed at the Coeur d'Alene Airport that Kootenai County would be the better holder of the Unicorn license. If possible, Kootenai County would like for both Resort Aviation Services, Inc. and Kootenai County to each hold a Unicorn license.

KOOTENAI COUNTY'S RESPONSES TO INTERROGATORIES AND REQUESTS FOR PRODUCTION

Dated this of October, 2002.

( Leg )	elu	
Greg Delavan		
Airport Manager		

SUBSCRIBED AND SWORN before me, a Notary Public for the State of Idaho, this 25 day of October 2002. Notary Public for the State of Idaho Residing at: Post Jalls Commission Expires: 11 - 26 - 06 Dated this 25 day of October, 2002 Attorney for Kootenai County P.O. Box 9000/L\$ Coeur d'Alene, ID 83816-9000 FAX: (208) 446-1621 **CERTIFICATE OF SERVICES** John A. Cafferty certifies that he has on this \_\_\_\_\_day of October, 2002, caused to be sent by the method indicated, a copy to the following: U.S. Mail HAND DELIVERED **OVERNIGHT MAIL** 

TELEFAX (FAX)